

## **REMARKS**

Claims 1-35 are pending. The Examiner's reconsideration of the rejection in view of the remarks is respectfully requested.

Claims 34 and 35 have been rejected under 35 USC 112, first paragraph, as failing to comply with the written description requirement. The Examiner stated essentially that the claims contain subject matter, “deriving knowledge” and “derives knowledge,” which was not described in the specification...

Respectfully, the limitations of Claims 34 and 35 are described at, for example, page 18, line 22, through page 21, line 2 (e.g., “perform inferencing on facts and rules to derive new facts”). Reconsideration of the rejection is respectfully requested.

Claims 1-33 have been rejected under 35 U.S.C. 102(a) as being anticipated by *IBM*, “Websphere Application Server Enterprise Services Business Rule Beans (BRBeans),” 2001 (hereinafter *IBM*). Applicants note that Claims 34 and 35 are also addressed under this rejection. The Examiner stated essentially that *IBM* teaches or suggests all of the limitations of Claims 1-35.

Claims 1, 24 and 33 are the independent claims.

Under 35 U.S.C. §102, a claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. The identical invention must be shown in as complete detail as is contained in the claim.

Claims 1 and 33 claim, *inter alia*, “identifying inferencing aspects for a program; and providing the identified inferencing aspects as inferencing components, wherein the inferencing

components are externalizable.” Claim 24 claims, “an identification component configured to identify at least one point of variability within an application program; and an externalization component for providing the identified at least one point of variability with externalized business logic, the externalized business logic including an inferencing component.”

*IBM* teaches externalized business rules (see page 32). *IBM* does not teach, “providing the identified inferencing aspects as inferencing components, wherein the inferencing components are externalizable,” as claimed in Claims 1 and 33 nor “an externalization component for providing the identified at least one point of variability with externalized business logic, the externalized business logic including an inferencing component” as claimed in Claim 24.

The externalized business rules of *IBM* adhere to externalization techniques, wherein logic and data are implemented for making classifications, for example, for checking whether a truck weight entered is valid (see *IBM*, page 33, point 1) (for a further discussion of externalization techniques see page 7-8 of the present application – e.g., in the context of externalization, “rules” are not those usually associated with artificial intelligence community, but are rather ones used to make everyday “business” decisions). Thus, the externalized business rules of *IBM* are not analogous to inference components as claimed in Claims 1, 24 and 33. For example, one could write an externalized business rule as described in *IBM*, however, *IBM* is completely devoid of teachings for causing the externalized business rule to do inferencing. The externalized business rules of *IBM* are used for making classifications and do not include inference components.

Inferencing derives new knowledge from rules and knowledge. Referring to the Examiner’s suggestion that the operation of an IF/THEN statement is a modus ponens inference; The IF/THEN statement of *IBM* is a conditional statement used in only classification and lacks inherent inferencing capabilities, e.g., the derivation of knowledge. Thus, the IF/THEN statement

is merely a logical argument that cannot be considered an inference (a modus ponens inference is not analogous to an inference). Therefore, *IBM* fails to teach all the limitations of Claims 1, 24 and 33.

Claims 2-23 and 34 depend from Claim 1. Claims 25-32 and 35 depend from Claim 24. The dependent claims are believed to be allowable for at least the reasons given for Claims 1 and 24. The Examiner's reconsideration of the rejection is respectfully requested.

For the forgoing reasons, the application, including Claims 1-35, is believed to be in condition for allowance. Early and favorable reconsideration of the case is respectfully requested.

Respectfully submitted,

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